

MILES2SMILE FOUNDATION



POLICY DOCUMENT UPDATED 2023



DATA PROTECTION POLICY

Data Protection Policy

1. Preamble

Miles2Smile Foundation is committed to processing data in accordance with its responsibilities under the IT Act 2000. Sensitive Personal Data or Information Rules (SPDI) 2011 under the Information Technology Act, 2000, currently protects our data.

2. Purpose

This policy requires that personal data shall be:

- 2.1 Processed lawfully, fairly and in a transparent manner in relation to individual;
- 2.2 Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- 2.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 2.4 Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 2.5 Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

3. Data Minimization

Miles2Smile Foundation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. Accuracy

The Organization shall take reasonable steps to ensure personal data is accurate.

Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

5. Security

- 5.1 Miles2Smile Foundation shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- 5.2 Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorized sharing of information.
- 5.3 When personal data is deleted this should be done safely such that the data is irrecoverable.

5.4 Appropriate back-up and disaster recovery solutions shall be in place.

5.5 For the purposes of social media, Miles2Smile Foundation website, newspaper articles, it must be ensured that the data of all persons involved with Miles2Smile Foundation in any way is collected, displayed and shared with complete consent of the subject. In case the subject is a minor, the consent of parents or guardians is required.

6. Copyright Protection

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7. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, Miles2Smile Foundation shall promptly assess the risk to people's rights and freedoms and if appropriate, shall report this breach to the legal and police authorities.

About the organization:

Miles2Smile was established three years back as a not-for-profit organization, based in Delhi. The organization works primarily in relief activities and brings smiles to the faces of victims looming over penury and distress. Livelihood creation, healthcare and educational empowerment are also some core areas of work by the organization. In the past two years, the organization has made commendable service in delivering solace to the people languishing in the heap of despair. The organization is on an assiduous mission to revive happiness to the people ripped after communal tensions.



011-41557836



+918448817331



www.miles2smile.org



contact@miles2smile.org

MILES2SMILE FOUNDATION

B-99/A, Third Floor, Behind Zayed College
for Girls, Thokar No-7 , Shaheen Bagh, New
Delhi, 110025